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Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to
47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1**

Dear FCC,

The statement 'in the residential marketplace, competition will not be materially affected by forbearance from Section 251(c)(3) because there is effectively no remaining UNE-based competition in the marketplace' is not accurate. This action will harm consumers and impede economic development in the United States [1]. As stated in [1], 'duopoly competition cannot be relied upon to protect consumers' and 'eliminating the current UNE pricing regime would almost certainly result in an increase in the prices that Sonic would have to pay to lease these circuits.'

Russo et al. [2] noted that 'the data that we have collected in the past three years demonstrates that the majority of U.S. cities surveyed lag behind their international peers, paying more money for slower Internet access' and 'when it comes to the estimated speeds a customer could expect to get for \$50 in each of the cities we surveyed, the U.S. is middling at best, with many cities falling to the bottom of the pack.'

References:

1. Sappington, D.E.M., Premature, Ubiquitous Forbearance Will Harm Consumers, available at <https://ecfsapi.fcc.gov/file/10806210367023/Attachment%201%20-%20Sappington%20INCOMPAS%20Report%20%5BREDACTED%5D.pdf>, accessed 3 Sep 2018.

2. Russo, N., Kehl, D., Morgus, R. and S. Morris, The Cost of Connectivity 2014, available at <https://www.newamerica.org/oti/policy-papers/the-cost-of-connectivity-2014/>, accessed 3 Sep 2018.

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